

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

CAMBRIA COMPANY LLC,

Plaintiff,

Case No. 1:20-cv-508 (JMB/PJG)

vs.

Hon. Jane B. Beckering

LAKESIDE SURFACES, INC.,

Defendant.

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**STIPULATION RE: PROPOSED ORDER TO COMPEL LAKESIDE’S COMPLIANCE  
WITH DISCOVERY OBLIGATIONS**

WHEREAS, Defendant Lakeside Surfaces, Inc. (“Lakeside”) has yet to respond to Plaintiff Cambria Company LLC’s (“Cambria”) Second Set of Interrogatories (Nos. 12-15), served on September 17, 2021 (Dkt. No. 38);

WHEREAS, Lakeside has yet to respond to Cambria’s Second Set of Requests for Production (Nos. 24-31), served on September 17, 2021 (*Id.*);

WHEREAS, Lakeside produced, in response to Cambria’s First Set of Requests for Production, served on April 15, 2021 (Dkt. No. 23), email documents but did not include the attachments associated with these emails;

WHEREAS, Cambria has repeatedly requested the production of the associated email attachments;

WHEREAS, Lakeside’s delay in producing documents and responding to Cambria’s interrogatories has delayed the taking of depositions in this case;

THEREFORE, Cambria and Lakeside (collectively, the “parties”), through their undersigned counsel, hereby stipulate to this proposed Order to Compel Lakeside’s Compliance with Discovery Obligations and respectfully request that the Court enter this proposed Order.

**Dated: February 25, 2022**

**STIPULATED:**

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**ORDER TO COMPEL LAKESIDE'S COMPLIANCE WITH DISCOVERY  
OBLIGATIONS**

IT IS HEREBY ORDERED that the Parties' Stipulation to Compel Lakeside's Compliance with Discovery Obligations is GRANTED. Specifically, no later than March 3, 2022, Lakeside shall:

1. Reproduce the following production documents to include any associated email attachments: 00000005, 00000007, 00000025, 00000039, 00000041, 00000059, 00000064, 00000065, 00000090, 00000097, 00000119, 00000135, 00000145, 00000152, 00000196, 00000285, 00000289, 00000302, 00000336, 00000338, 00000350, 00000355, 00000362;
2. Provide substantive responses to Cambria's Second Set of Interrogatories (Nos. 12-15), served September 17, 2021; and
3. Provide documents responsive to Cambria's Second Set of Requests for Production (Nos. 24-31), served September 17, 2021.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2022

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Hon. Phillip J. Green, U.S. Magistrate Judge